

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA,
NORTHERN DIVISION

L. JOE PITTS, as Administrator of)	
the)	
Estate of SANDRA ANN SPENCE)	
PITTS, Deceased,)	
)	
Plaintiff,)	
)	
v.)	
)	
BRIDGESTONE AMERICAS)	CIVIL ACTION NO.:
HOLDINGS, INC.;)	2:06cv1008-MEF
BRIDGESTONE FIRESTONE)	
NORTH AMERICAN TIRE, LLC,)	
and BFS RETAIL AND)	
COMMERCIAL OPERATIONS,)	
LLC,)	
doing business as Firestone Tire &)	
Service Centers,)	
)	
Defendants.)	

JOINT MOTION FOR LEAVE OF COURT TO ADD PARTY
PLAINTIFF IN ORDER TO CONSUMMATE SETTLEMENT AND
MOTION FOR SETTING OF PRO AMI HEARING

COME NOW Defendants, Bridgestone Americas Holding, Inc.,
Bridgestone Firestone North American Tire, LLC, and BFS Retail &
Commercial Operations, LLC (collectively referred to as "Firestone") and
Plaintiff, L. Joe Pitts, as Administrator of the Estate of Sandra Ann Spence
Pitts, Deceased, and state as follows:

1. This case arose out of a one-vehicle accident that occurred on June 19, 2006.

2. The occupants of the vehicle were the plaintiff's decedent (Sandra Pitts) and her and the plaintiff's two children, Gregory Pitts and Joe Dante Pitts.

3. The case mediated successfully and a confidential resolution was reached on or about June 25, 2007.

4. The resolution of the case, however, involves all claims arising out of the accident, including the individual claims of Gregory Pitts, a minor, who is currently 16 years old.

5. A conservator is in the process of being appointed for Gregory Pitts; however, in order to obtain Court approval for his individual settlement, it will be necessary to join Gregory Pitts to this action.

6. The parties therefore respectfully request leave of Court in order to add Gregory Pitts as a party plaintiff to this action and respectfully request the setting of a pro ami hearing in order to obtain Court approval for the settlement of his individual claims.

7. Counsel for Firestone has the consent of counsel for Plaintiff to electronically file this motion.

s/Robert P. Bruner, Esq.

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